

Medical Marijuana Laboratory Testing Operating Plan

ISO Accreditation Requirements

Proof of ISO 17025 accreditation will be required in order to receive a Medical Marijuana (Cannabis) Testing Laboratory Business License. ISO accreditation must be provided by a third-party accreditation body that has been shown to operate in conformance with ISO 17011 standards. ISO accreditation is required for each test that the Laboratory will perform on marijuana products. A Testing Laboratory may, at its discretion, obtain ISO accreditation for a limited set of marijuana tests (e.g. THC and CBD content) and increase its scope at a later date (e.g. mold, pesticides, residual solvents, water activity, etc.). However, until a Testing Laboratory obtains ISO accreditation for the increased scope, the Laboratory may only perform marijuana tests that have been accredited.

Recognizing that a Laboratory must obtain cannabis materials in order to validate test methods prior to receiving full ISO accreditation, the City will allow applicants to possess marijuana at the proposed facility for the sole purpose of obtaining ISO accreditation during the business license application process. The City will grant temporary authority to possess and test marijuana only to those laboratories who have completed the following tasks:

1. Submitted a Testing Laboratory business license application;
2. Received confirmation that the location of the business satisfies all buffer requirements;
3. Completed Department plan check and building inspections;
4. Obtained a Certificate of Occupancy from the Development Services Department.

Once these tasks have been completed, the Department of Health & Human Services will issue a Provisional Permit allowing the business to obtain, possess, and test cannabis for the limited purpose of completing ISO accreditation. The provisional license will expire after six months, but may be extended at the request of the applicant. The Department of Health and Human Services will review and approve or deny all extension requests. **The Testing Laboratory may not perform tests on behalf of other cannabis businesses, patients, or caregivers until ISO Accreditation is obtained, and a business license is issued by the City.**

Testing Laboratories licensed by the City will have six (6) months to obtain a Medical Cannabis Regulation and Safety Act (MCRSA) Type 8 Testing Laboratory license upon notification that the State is issuing such licenses. Failure to obtain a Type 8 Testing Laboratory license within the six month window may result in revocation by the City of the local Testing Laboratory business license. Denial of a MCRSA Type 8 license will result in the immediate revocation by the City of the local Testing Laboratory business license.

Overall Operating Plan

An operating plan is required for all medical marijuana laboratory testing facilities. The operating plan must meet, at a minimum, the requirements as set forth in LBMC Chapter 5.90. Any statement made in the Operating Plan may not supersede any local and/or state laws, rules, and regulations.

The operating plan must include all of the elements described below for the application to be deemed complete. The operating plan will be forwarded to Development Services, Fire, and Health Departments for additional review during the plan check phase. Departments maintain the ability to reject an operating plan that does not meet minimum standards to protect the health and safety of employees, patients, or the general public.

The operating plan shall include a table of contents with page numbers indicating the start of each section. Each section of the operating plan should be clearly labeled with a cover sheet for each section. Sections should also be individually tabbed and labeled. The operating plan must have page numbers in the bottom right hand corner. DO NOT staple or bind the operating plan. You may submit the Medical Marijuana Business License Application

and the Laboratory Testing Operating Plan in a three ring binder or in an envelope. Both the Medical Marijuana Business License Application and the Laboratory Testing Operating Plan must be submitted at the same time and in the same three ring binder or envelope.

General Description of Services

Each applicant should submit an operating plan describing their proposed business model. The operating plan should provide an account of the day-to-day operations of the facility, including a description of the testing services that will be offered to marijuana businesses, patients, primary caregivers, or other customers.

Security

Applicants should provide a detailed description of their security plans. The security component should be broken down into operational and facility security categories. Appropriate plans will have considered all potential security threats and planned for any contingency needed for these situations. A successful applicant will have both written and physical mechanisms in place to deal with each specific situation. A detailed schematic diagram (no larger than 11" x 17") of alarm systems and security camera placements that also details when all security measures will be operational should be provided.

Operational Security

Applicants will detail their operational security including but not limited to general security policies for the facility, employee specific policies, training, sample written policies, transactional security, confidential information security, visitor security, 3rd party contractor security, and transportation security. The security plan should also demonstrate a method to track and monitor inventory so as to prevent theft or diversion of marijuana. This includes storing all medical cannabis or medical cannabis products in a secured and locked room, safe, or vault, and establishing limited access areas accessible only to authorized personnel. The security plan should include measures to prevent the diversion of marijuana. The security plan should also consider measures to prevent individuals from remaining on the premises if they are not engaging in activity expressly related to the operations of the business, and ensure that medical marijuana is not inhaled, smoked, eaten, ingested or otherwise consumed on the property, or in the parking areas of the property.

This list is not intended to fully capture all areas for applicant consideration but to guide applicants into thinking about all possible security concerns related to the operation of a medical marijuana Testing Laboratory. The applicant should give consideration to every possible scenario and provide a response to those scenarios.

Facility Security

Applicants should provide a description of the overall facility security. In particular, the Applicant should address ingress and egress access, perimeter security, product security (at all hours), internal security measures for access (area specific), types of security systems, and security personnel that will be employed. The security plan should describe the enclosed, locked facility (incorporated into the building structure, or securely attached thereto) that will be used to secure or store marijuana and cash when the location is both open and closed for business. The plan should also detail the steps taken to ensure marijuana is not visible to the public.

The facility security plan should also discuss the fire and burglar alarm systems. The plan should identify the company monitoring the alarm, and provide confirmation that the company is staffed twenty-four (24) hours a day, seven (7) days a week.

Each Medical Marijuana Business shall install and maintain a fully operational digital video surveillance and camera recording system. The facility security plan should further describe the digital video surveillance and camera recording system that will be used to monitor the front and rear of the property, all public right-of-ways and any parking lots under control of the medical marijuana business, all points of ingress and egress at the business, all areas within the business where medical marijuana products are to be stored and/or tested, and all limited access areas within the facility.

Noxious/Toxic Chemical Control

Applicants should provide a description of what methods will be used to ensure that odor generated inside the Testing Laboratory is not detected outside the business premises. This should include a description of the odor-absorbing ventilation and exhaust system, and how that system will prevent odor from leaving the property. The operating plan may also describe alternative methods to control odors, such as a carbon filtration or other system.

In addition, applicants should provide a description of all ventilation systems used to mitigate noxious gases or other fumes used or created as part of the testing process. Applicants should also provide a description of methods that will be used to prevent the growth of harmful mold on the premises.

Applicants should provide a description of all toxic, flammable, or other materials that will be used or kept at the medical marijuana business, the location of such materials, and how such materials will be stored. This should include all materials regulated by a federal, State, or local government that would have authority over the business if it was not a marijuana business.

Applicants should also describe methods used to comply with limitations on discharge into the wastewater system of the City, as set forth in the Long Beach Municipal Code Chapter 15.16.

Tested Analytes

Within each category listed below, applicants should describe in detail the specific analytes (chemicals, compounds, microorganisms, etc.) that marijuana will be tested for by the Medical Marijuana Laboratory.

1. Identity;
2. Purity, such as analysis of:
 - a. Heavy metals;
 - b. Microbiological organisms;
 - c. Pesticides;
 - d. Residual solvents;
 - e. Water activity;
 - f. Foreign matter.
3. Strength, such as analysis of:
 - g. Cannabinoid content, including but not limited to:
 - i. Tetrahydrocannabinol (THC);
 - ii. Tetrahydrocannabinolic Acid (THCA);
 - iii. Cannabidiol (CBD);
 - iv. Cannabidiolic Acid (CBDA);
 - v. Cannabigerol (CBG);
 - vi. Cannabinol (CBN).
 - h. Terpenoid content.
4. Other quality factors, such as weight loss on drying, oil content, ash, acid-insoluble ash, etc.

Testing Methods

Applicants should provide a brief description of the tests and examinations that will be utilized by the Testing Laboratory in its analysis of marijuana. Tests may include, but are not limited to: gross organoleptic (sensory) analysis; macroscopic analysis; microscopic analysis; chemical analysis; genetic (DNA) analysis; or other scientifically valid methods.

In addition, applicants should provide a description of the standards that the Testing Laboratory will use to analyze marijuana samples. Per the Medical Cannabis Regulation and Safety Act, standards that may be used include:

1. The most current version of the cannabis inflorescence monograph published by the American Herbal Pharmacopoeia (AHP); or

2. Scientifically valid methodology that is demonstrably equal or superior to the inflorescence monograph published by the AHP.

If the Testing Laboratory proposes to utilize option 2, provide a description of the methodology that will be used as well as an explanation as to why the methodology is superior to the monograph published by the AHP.

Product Handling & Tracking

Applicants should describe the method utilized by the Testing Laboratory to collect test samples from businesses and/or patients, including transportation, refrigeration, use of preservatives, container types, or any other procedures to ensure the integrity of the test sample. Also describe the procedures that will be used to record the receipt of the test sample from the business or patient.

In addition, applicants should describe the procedures the Testing Laboratory will follow to handle and dispose of marijuana samples. This includes tracking samples through the analytical process to prevent diversion, storing test samples under appropriate conditions to protect the physical and chemical integrity of the sample, segregating samples from one another, and disposing of samples after the test is complete.

Product Reporting & Record Keeping

Applicants should describe how all raw data, documentation, protocols and final reports associated with the analysis of a test sample will be retained following the completion of an analysis. This should include a discussion of how the Testing Laboratory will ensure that records may be retrieved as needed, and what safeguards will be put in place to prevent deterioration and/or unauthorized alteration of records.

Applicants should also provide a summary of the information that will be contained in the sample test report to be provided to the business or patient. This may include, but is not limited to:

1. Date of receipt of sample;
2. Description of the type or form of the test sample (leaf, flower, oil, etc.);
3. The unique identification of the sample;
4. Date on which the analysis occurred;
5. The analytical method used, including the type of equipment;
6. The analytical results, including units of measure;
7. The identity of the supervisory or management personnel who reviewed and verified the data and results;
8. The name, address, and contact information of the Testing Laboratory;
9. A statement that the reported analytical results apply only to the test sample received.

Community Service

Applicants should provide a detailed description of their plans to participate in community service within the City of Long Beach. These plans may include, but are not limited to, involvement with non-profit associations, neighborhood associations, and community groups. Applicants should demonstrate how they intend to provide their local community with community benefits and mitigate any nuisance and/or negative impacts that the facility's existence may cause. Applicants should show how they plan to have minimal nuisance or negative impacts on their neighbors and community. Nuisance/negative impacts include but are not limited to: noise, odor, increased foot or vehicle traffic, increase in waste or water production, impacts to right of way access, and/or increase in safety related concerns. Applicants should detail how they will revitalize the building/site, provide neighborhood improvements, and will be a beneficial/positive neighbor to the surrounding area.

Fire Plan

Applicants should provide a detailed description of their fire prevention, suppression, alarm and life safety systems. A fire inspection will be required annually to assure the City that adequate fire safety measures remain in place. An appropriate plan will have considered all possible fire, hazardous material, and inhalation issues/threats and will have both written and physical mechanisms in place to deal with each specific situation.

A detailed description of the fire prevention, suppression, alarm and life safety systems that also includes when all fire prevention measures will be submitted for approval and be operational shall be required.

Employee Safety & Hygiene

Applicants should provide a summary of the safety protocols that will be adopted by the Testing Laboratory, including, but not limited to: staff training, protective equipment, hazardous material handling, emergency communication/response, etc. Businesses must conform to all Cal OSHA workplace safety standards.

Labor Relations

Applicants should provide a detailed description of their plans regarding labor relations and employee relations. Labor relations include Testing Laboratory ownership partaking in a labor peace agreement with a bona fide labor organization and paying employees a living wage (at least 200% of the Federal Poverty Level for a family of two). The employee relations plan should provide a detailed description of employee compensation and benefits, workplace safety, educational opportunities and trainings for employees, and policies put in place against discrimination.